

**COSUMNES POWER PLANT  
DATA ADEQUACY RESPONSES (01-AFC-19)**

## Section 2.1 Air Quality

**Data Adequacy Deficiency** – Staff expects that the Sacramento Metropolitan Air Quality Management District to issue an "Incompleteness Letter" by the week of October 8, 2001.

**Data Adequacy Response** – SMAQMD filed its completeness determination letter on October 26, 2001.

**Data Adequacy Deficiency** – Please provide the height of the HRSG stacks.

**Data Adequacy Response** – As stated in AFC Section 2.2.4.2, Heat Recovery Steam Generators, the height of the HRSG stacks is 160 feet (see also AFC Section 8.1.5.2.2).

**Data Adequacy Deficiency** – The confidential filing indicates a deficiency in ERCs necessary to fully offset the project. Please provide a discussion of who the Applicant is negotiating with that, if negotiations are successful, would result in sufficient ERCs to fully offset the project and satisfy the District New Source Review rule requirements. The discussion should also include the type of pollutant, the quantities and the location of the potential ERCs.

**Data Adequacy Response** – There are three aspects of this response. The first is related to additional details regarding the ERCs that are proposed to mitigate Phase I (and a portion of Phase II) of the project. These additional details will be provided in a supplemental confidential filing that will be provided under separate cover. The identical filing will be provided to the Sacramento Metropolitan Air Quality Management District (SMAQMD), also with a request for confidential treatment.

The second aspect relates to the identification of sources of ERCs that are currently owned by the District, and for which confidential treatment is not requested. The following table indicates the ERCs that are owned by the District, the source of the ERCs, the certificate number and air district that issued the ERCs, the type of pollutant and quantity of ERCs, and the location at which the ERCs were generated.

Summary of Emission Reduction Credits Owned by The Sacramento Municipal Utility District

ERC Source	Certificate Number	Issuing Agency	Pollutant	Quantity (tons/yr)	Location
Swansons Cleaners	00-00653	SMAQMD	ROC	36.33	Sacramento
Poppyridge Partners	01-00726	SMAQMD	PM10	1.55	Elk Grove
Poppyridge Partners	01-00726	SMAQMD	SOx	0.03	Elk Grove
Poppyridge Partners	01-00727	SMAQMD	PM10	0.32	Elk Grove
Poppyridge Partners	01-00727	SMAQMD	SOx	0.14	Elk Grove
Campbell Soup Co.	01-00736	SMAQMD	NOx	9.86	Sacramento
Campbell Soup Co.	01-00737	SMAQMD	CO	7.63	Sacramento
Campbell Soup Co.	01-00737	SMAQMD	NOx	2.80	Sacramento
Campbell Soup Co.	01-00737	SMAQMD	PM10	1.71	Sacramento
Campbell Soup Co.	01-00737	SMAQMD	SOx	0.35	Sacramento
Donner Furniture	01-00750	SMAQMD	ROC	1.30	North Highlands
Proctor & Gamble Mfg.	01-00755	SMAQMD	ROC	50.0	Sacramento

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ERC Source	Certificate Number	Issuing Agency	Pollutant	Quantity (tons/yr)	Location
Concrete, Inc.	01-00758	SMAQMD	PM10	2.90	Rancho Cordova
Grace Industries	95-00388	SMAQMD	SOx	2.31	Elk Grove
Grace Industries	95-00390	SMAQMD	SOx	1.61	Elk Grove
SMUD Rancho Seco	98-00471	SMAQMD	CO	0.09	Sacramento Co.
SMUD Rancho Seco	98-00471	SMAQMD	PM10	0.12	Sacramento Co.
SMUD Rancho Seco	98-00471	SMAQMD	ROC	0.08	Sacramento Co.
SMUD Rancho Seco	98-00471	SMAQMD	SOx	0.35	Sacramento Co.
SMUD Rancho Seco	98-00473	SMAQMD	CO	0.04	Sacramento Co.
SMUD Rancho Seco	98-00473	SMAQMD	PM10	0.09	Sacramento Co.
SMUD Rancho Seco	98-00473	SMAQMD	ROC	0.06	Sacramento Co.
SMUD Rancho Seco	98-00473	SMAQMD	SOx	0.25	Sacramento Co.
SMUD Rancho Seco	98-00475	SMAQMD	CO	0.15	Sacramento Co.
SMUD Rancho Seco	98-00475	SMAQMD	PM10	0.26	Sacramento Co.
SMUD Rancho Seco	98-00475	SMAQMD	ROC	0.00	Sacramento Co.
SMUD Rancho Seco	98-00475	SMAQMD	SOx	0.52	Sacramento Co.
SMUD Rancho Seco	98-00477	SMAQMD	CO	0.13	Sacramento Co.
SMUD Rancho Seco	98-00477	SMAQMD	PM10	0.24	Sacramento Co.
SMUD Rancho Seco	98-00477	SMAQMD	ROC	0.10	Sacramento Co.
SMUD Rancho Seco	98-00477	SMAQMD	SOx	0.52	Sacramento Co.
SMUD Rancho Seco	98-00479	SMAQMD	CO	7.89	Sacramento Co.
SMUD Rancho Seco	98-00479	SMAQMD	PM10	1.58	Sacramento Co.
SMUD Rancho Seco	98-00479	SMAQMD	ROC	0.32	Sacramento Co.
SMUD Rancho Seco	98-00479	SMAQMD	SOx	66.72	Sacramento Co.
Formica Corporation	2000-0007	PCAPCD	ROC	135.00	Rocklin
Formica Corporation	2001-17	PCAPCD	ROC	72.10	Rocklin
SierraPine, Ltd	2000-04	PCAPCD	PM10	27.93	Rocklin
SierraPine, Ltd	2001-19	PCAPCD	PM10	5.47	Rocklin
SierraPine, Ltd	99-00004	PCAPCD	PM10	16.47	Rocklin
Burns Philp Food Inc.	EC-0120	YSAQMD	PM10	1.04	Dixon
Burns Philp Food Inc.	EC-0121	YSAQMD	VOC	0.02	Dixon
Burns Philp Food Inc.	EC-0121	YSAQMD	NOx	1.00	Dixon
Burns Philp Food Inc.	EC-0121	YSAQMD	SOx	0.01	Dixon
Burns Philp Food Inc.	EC-0121	YSAQMD	PM10	4.93	Dixon
General Mills, Inc.	EC-0123	YSAQMD	NOx	1.80	Woodland
General Mills, Inc.	EC-0123	YSAQMD	PM10	1.15	Woodland
General Mills, Inc.	EC-0124	YSAQMD	PM10	1.06	Woodland
Bethel World Foundation	99001-T2	FRAQMD	NOx	25.14	Sutter Co.
Bethel World Foundation	99001-T2	FRAQMD	PM10	33.67	Sutter Co.
Bethel World Foundation	99001-T2	FRAQMD	ROC	29.93	Sutter Co.
Bethel World Foundation	99001-T2	FRAQMD	SOx	6.92	Sutter Co.
Bethel World Foundation	99002-T2	FRAQMD	NOx	0.32	Sutter Co.

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Bethel World Foundation	99002-T2	FRAQMD	PM10	0.42	Sutter Co.
Bethel World Foundation	99002-T2	FRAQMD	ROC	0.38	Sutter Co.
Bethel World Foundation	99002-T2	FRAQMD	SOx	0.09	Sutter Co.

The third aspect of this response is related to the additional ERCs that will be required for Phase II of the project. The District anticipates that the Commission and SMAQMD will impose a number of conditions on both phases of the project, if certification is granted. With respect to Phase II, the District anticipates that the Commission and SMAQMD will impose conditions that prohibit the construction of Phase II unless the additional ERCs required for this phase are identified and shown to satisfy SMAQMD requirements. Furthermore, the District anticipates that the Commission and SMAQMD will impose a condition that requires a re-assessment of Best Available Control Technology requirements for Phase II if there is not a continuous schedule of construction for the overall project. Based on the U.S. Environmental Protection Agency's policies regarding phased construction of long-term projects, we anticipate that this BACT re-assessment will be required if the construction of Phase II does not begin with 18 months of the commercial operation date for Phase I. To the extent that the District is able to secure additional ERCs for Phase II during the current CEC licensing process, information regarding these additional ERCs will be provided to both the CEC and SMAQMD.

**Data Adequacy Deficiency** – Please provide a topographic map containing the contour and elevation data, at a scale of 1:24,000 showing the area within 6 miles of the power plant site.

**Data Adequacy Response** – Additional USGS Quad maps were provided to CEC on October 12, 2001.